

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CHARLIE VICK

)
)
)
) Docket No. 23-CR-40003-MRG
)
)

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, Charlie Vick, and hereby moves this Honorable Court for an order modifying his terms of release such that he has a curfew instead of home confinement. In support of his motion, Mr. Vick states as follows:

1. Mr. Vick is currently on conditions of release which include home confinement with windows for certain purposes, including work.
2. Mr. Vick has been on release for nearly two months, and has been working doing deliveries.
3. Mr. Vick provides a work schedule to probation, but that schedule is varied and changes on a weekly basis.
4. Mr. Vick seeks to have that condition modified so that he is on a curfew - where he may be free to work or do errands during the days and is restricted to his home at night. He is requesting that the curfew run from 10:00 p.m. each night through 8:00 a.m. each morning.
5. The defendant has conferred with both probation and the government regarding his proposed revisions to the supervision conditions. Neither party assents to any changes in Mr. Vick's current conditions of release.

6. The government has stated that it will object to any changes in the supervision conditions of Mr. Vick.

Respectfully submitted,
Charlie Vick

By: */s/ Richard J. Farrell* .
Farrell|Fernandez, P.C.
MA BBO# 638017
47 Harvard Street
Worcester, MA 01609
508.393.3600
Richard.Farrell@yahoo.com

Dated: January 14, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified in the Notice of Electronic Filing on this date.

/s/ Richard J. Farrell
Richard J. Farrell

Dated: January 14, 2025